

## **EXHIBIT T**

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1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

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3 DR. SARI EDELMAN,

4 Plaintiff,

5 v. 21 Civ. 502 (LJL)

6 NYU LANGONE HEALTH SYSTEM, *et*  
7 *al.*,

8 Defendants.

Trial

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9 New York, N.Y.  
10 July 11, 2023  
9:00 a.m.

11 Before:

12 HON. LEWIS J. LIMAN,

13 District Judge  
14 -and a Jury-

15 APPEARANCES

16 MILMAN LABUDA LAW GROUP PLLC

Attorneys for Plaintiff

17 BY: JOSEPH M. LABUDA

EMANUEL S. KATAEV

18 TARTER KRINSKY & DROGIN LLP

Attorneys for Defendants

19 BY: RICHARD C. SCHOENSTEIN

20 RICHARD L. STEER

21 INGRID J. CARDONA

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Edelman - Direct

1 day?

2 A. My complaint was about the, the hostile and abusive  
3 behavior that had occurred the day before with Mr. Atonik; that  
4 I didn't feel safe and I wanted it rectified; that I felt that  
5 it was a sexist, discriminatory, chauvinistic attack and it  
6 needed to be addressed with HR. We went through the events of  
7 what happened on the phone. I was probably on the phone with  
8 her for 20, 30 minutes. She took everything down. There was a  
9 case number assigned, and she said that she would get back to  
10 me.

11 Q. Why did you think that it was a sexist, chauvinistic  
12 incident with Mr. Atonik?

13 A. The way he was speaking to me, telling me that nothing in  
14 that office belongs to me. There were my diplomas on the wall.  
15 It was space that I had negotiated with NYU to see and treat my  
16 patients based on my experience as a rheumatologist. There was  
17 no seniority that he had over me to say that he, he had -- that  
18 it belonged to him more than me. The only difference was that  
19 he was a male, and he was saying he owned me.

20 I was with the organization at that space longer than him.  
21 I had more years of training than him, and he's telling me that  
22 this is his.

23 Yes, NYU employs me, but he doesn't own me. He doesn't own  
24 the things in my office. He doesn't own the right to tell  
25 me -- to say you're going to do what we tell you to do. This

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Edelman - Cross

1 employment in Florida, you went from one job to another?

2 A. Yes.

3 Q. You didn't miss a paycheck?

4 A. I can't answer that 100 percent based on when the paychecks  
5 came in.

6 Q. But you're not aware of missing a paycheck?

7 A. I don't know the answer to that.

8 Q. And you've remained employed continuously ever since May of  
9 2021, right, same employer, same job?

10 A. Yes.

11 Q. They have you on a partnership track there?

12 A. Not as of yet.

13 Q. Is it anticipated you will be on a partnership track?

14 A. I am hopeful, yes.

15 Q. If that works out, you could be a part owner of that  
16 business in Florida?

17 A. In several years.

18 Q. By the way, there's no state income tax in Florida; right?

19 MR. LABUDA: Objection.

20 THE COURT: Overruled.

21 A. Yes.

22 Q. So \$300,000 in Florida is worth more than \$300,000 in New  
23 York; fair to say?

24 MR. LABUDA: Objection.

25 THE COURT: Overruled.

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Edelman - Cross

1 A. Yes.

2 Q. Now I want to talk a little bit about the move to Florida.

3 You indicated that you were forced to relocate; is that  
4 correct? That's what you said in your testimony?

5 A. Yes.

6 Q. You had talked with your family about moving to Florida  
7 before your contract was not renewed; correct?

8 A. That is not correct.

9 Q. You mentioned to Dr. Mehta being interested in moving to  
10 Florida; correct?

11 A. I did not.

12 Q. Your husband had posted on social media about being upset  
13 about the high costs of New York State taxes; isn't that  
14 correct?

15 MR. LABUDA: Objection. Hearsay.

16 THE COURT: Overruled.

17 A. I have no idea.

18 Q. Let's look at some documents.

19 You received notice of nonrenewal of the NYU contract on  
20 December 1, 2021. Do you agree with that?

21 A. Yes. Well, I received it on December 2 of 2021.

22 Q. You received it on December 2?

23 A. Yes.

24 Q. Was it on that day that you called Andrew Rubin?

25 A. Yes.

1 THE COURT: Any objection to 88?

2 MR. LABUDA: No objection, your Honor.

3 THE COURT: 88 is received. Can be published to the  
4 jury.

5 (Plaintiff's Exhibit 88 received in evidence)

6 Q. There is a lot of material in 88 and I'm going to ask you  
7 to look at specific things, Dr. Edelman.

8 Do you recall producing a lot of materials regarding your  
9 job search and the job you took in Florida?

10 A. Yes.

11 MR. SCHOENSTEIN: Can we go to page P167.

12 Q. Now, do you see this email, this is Friday, December 4?

13 A. Uh-huh.

14 Q. Do you see that, Dr. Edelman?

15 A. I do.

16 Q. And that's two days after receiving notice of nonrenewal?

17 A. Yes.

18 Q. And you're writing to a recruiter saying "I am currently  
19 employed at NYU and looking to make a move to Florida." Do you  
20 see that?

21 A. Yes, I do.

22 Q. So that is what you were telling recruiters as of  
23 December 4, 2020, that you were looking to make a move to  
24 Florida?

25 A. I was saying that to every recruiter in every state with

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Edelman - Cross

1 the same message that I sent it to.

2 Q. I only asked you about Florida. You were telling  
3 recruiters, as you did in this email, that you were looking to  
4 make a move to Florida; correct?

5 A. Yes, I was letting them know if I get a job, I will be  
6 moving from New York to Florida.

7 MR. SCHOENSTEIN: Move to strike the last part of that  
8 answer, your Honor.

9 THE COURT: Overruled.

10 Dr. Edelman, I'm going to instruct you to answer the  
11 questions that are being asked. You will have an opportunity  
12 during redirect examination to clarify any answers that you've  
13 given if there are additional things that should be brought to  
14 the jury's attention in the view of your lawyer.

15 THE WITNESS: Okay.

16 MR. SCHOENSTEIN: Ms. Cardona, please turn to P178.

17 Q. This is another email exchange on December 4, and you say:  
18 "We are looking to relocate to Florida, Delray Beach, West Palm  
19 Beach, Clearwater, Tampa area." Do you see that?

20 A. Yes.

21 Q. So by the 4th of November, you had not only identified  
22 Florida, you had identified specific locations in Florida that  
23 you were interested in; is that correct?

24 THE COURT: I think you said 4th of November. Did you  
25 mean the 4th of December?

1 MR. SCHOENSTEIN: I did, your Honor. Thank you.

2 A. Yes.

3 Q. And you got some pretty fast responses to these inquiries  
4 and your inquiries in general; is that correct?

5 A. The document I'm looking at -- I'm sorry. What's your  
6 question?

7 Q. The question is a little more general. You got some pretty  
8 quick responses to your inquiries about job positions in  
9 Florida?

10 A. Yes, I got quick inquiries to all my job -- everything I  
11 put out.

12 MR. SCHOENSTEIN: Scroll down, please, to page 189.

13 A. I just want to go back to this document because everything  
14 lists Albany, Syracuse, New York, like what you're showing me  
15 on the screen.

16 MR. SCHOENSTEIN: Your Honor, move to strike.

17 THE COURT: The testimony is stricken.

18 Members of the jury, let me instruct you. The way  
19 that the examination proceeds is each lawyer asks the questions  
20 that they think will elicit the information that will be  
21 helpful for you in making a decision, so that's what happens on  
22 direct examination, on cross examination. The lawyer asks the  
23 questions that the lawyer believes will bring out the  
24 information that will be helpful to you from their perspective  
25 and then there'll be an opportunity on redirect examination, as